Postal Regulatory Commission Submitted 10/19/2015 4:06:40 PM Filing ID: 93586 Accepted 10/19/2015

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 45 (MC2013–4)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2013-4

MOTION OF THE UNITED STATES POSTAL SERVICE FOR TEMPORARY RELIEF

(October 19, 2015)

The United States Postal Service hereby moves for temporary relief, to allow the existing contract in this docket to remain in effect for thirty (30) additional days. The customer whose competitive product rates were established in this docket wishes to renew its commitment to sending large volumes of Priority Mail for the next year at negotiated rates. By the terms of the contract filed in this docket, the current rates will expire on October 26, 2015.

The Postal Service and the customer have been working cooperatively over the past month to reach a new agreement, which would have avoided any interruption in the Postal Service's ability to provide this customer access to negotiated rates. The parties have agreed on the prices and terms for the new agreement, and the Postal Service has submitted a final contract to the customer for signature. However, the contract is currently being routed through the customer's internal review processes for final approval and signatures, and that process has been delayed. The Postal Service has not received the signed contract in time to file it more than 15 days in advance of the expiration date of the current agreement. The customer now faces the prospect of an interruption in its access to negotiated rates.

2

Therefore, the Postal Service respectfully requests that the Commission grant a

thirty (30) day extension to allow the existing contract to remain in effect. The thirty day

time period would give the customer additional time to finalize and sign the contract,

and return it to the Postal Service so that it can be filed with the Commission more than

15 days in advance of the new expiration date. Thus, the proposed extension would

only last for a finite and relatively short period of time. In conclusion, for the reasons

discussed above, and in consideration of the customers' business continuity, the Postal

Service hereby moves for temporary relief to allow the existing contract to remain on the

competitive products list for thirty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.

Chief Counsel, Pricing and Product Support

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137

(202) 268-3179, Fax -6187

elizabeth.a.reed@usps.gov

October 19, 2015